

LAW OFFICES OF DALE K. GALIPO

Dale K. Galipo, Esq. (SBN 144074)
dalekgalipo@yahoo.com
Cooper Alison-Mayne (SBN 343169)
cmayne@galipolaw.com
21800 Burbank Boulevard, Suite 310
Woodland Hills, CA 91367
Phone: (818) 347-3333

LAW OFFICES OF DEAN PETRULAKIS

Dean Petrulakis, Esq. (Bar No. 192185)
1600 G Street, Suite 202
Modesto, CA 95354
Tel: (209) 522-6600

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DOROTHEY HEIMBACH,
individually and as successor in
interest to Anthony Silva,

Plaintiff,

v.

STANISLAUS COUNTY; and
JUSTIN CAMARA, ZA XIONG,
and ERIC BAVARO, in their
individual capacities,

Defendants.

Case No. 2:23-cv-1887-DJC-KJN

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION TO
COMPEL DEFENDANT
STANISLAUS COUNTY TO
PRODUCE DOCUMENTS
RESPONSIVE TO REQUESTS FOR
PRODUCTION**

Hearing Date: December 10, 2024

Hearing Time: 10:00 AM

Magistrate Judge: Chi Soo Kim
Robert T. Matsui United States
Courthouse
501 I Street
Sacramento, CA 95814
Courtroom 25, 8th floor

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
RECORD HEREIN:**

NOTICE IS HEREBY GIVEN that on December 10, 2024, at 10:00 a.m., or as soon thereafter as counsel may be heard by the above-entitled Court, Plaintiff DOROTHEY HEIMBACH will and hereby does move for an Order compelling Defendant STANISLAUS COUNTY to:

- Produce use-of-force reports and citizen complaints authored by Deputies Justin Camara or Za Xiong; and
- Produce internal communications, notes, and memoranda referring to the October 8, 2022 use-of-force incident involving Anthony Silva with privileged portions redacted;
- Produce departmental statistics on use of force incidents for the five years preceding October 8, 2022.

This motion is brought on the grounds that such records are relevant and discoverable to both the individual liability claims against the County. Despite multiple meet and confer sessions resulting in agreements for production, the County has produced minimal documents.

This motion is based on this Notice of Motion and Motion, the forthcoming Joint Statement re Discovery Disagreement, the pleadings and papers on file herein, and upon such other evidence or argument as may be presented to the Court at the time of the hearing.

DATED: November 14, 2024

LAW OFFICES OF DALE K. GALIPO

By: /s/ Cooper Alison-Mayne

Dale K. Galipo

Cooper Alison-Mayne

Attorneys for Plaintiff